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July 29, 2024

Via Electronic Filing

The Honorable John Milton Younge
15613 U.S. Courthouse
Courtroom 15-B
601 Market Street
Philadelphia, PA 19106

**Re: American Environmental Enterprises, Inc. v. Manfred Sternberg,
Esquire, et al.
U.S.D.C. Eastern District No.: 2-22-cv-00688-JMY**

Dear Judge Younge:

We represent the so-called “Sternberg Defendants” in these proceedings. Your Honor will recall that no other defendant is currently represented by counsel. We write with an eye toward the case management deadlines articulated in the March 20, 2024 Amended Scheduling Order (ECF 154), and in particular expert submissions.

Our understanding is that subparagraph 1(b) of the Order requires plaintiff, and any other party asserting an affirmative claim, to produce affirmative expert reports by Friday, August 2, 2024. Per the order, any defendant producing a rebuttal submission must do so by Friday, August 16.

In our practice and experience, it has always been the plaintiff to first provide expert submissions, and then the defendant is permitted to respond accordingly. We understand that a similar approach would apply here, but wanted to confirm Your Honor’s preference, especially with the first deadline set for this Friday.

Respectfully submitted,

GOLDBERG SEGALLA

/s/ Joseph Ross
Joseph Ross

cc: All counsel of record via ECF; All unrepresented parties via email

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